

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

STEPHANIE RISTOW,
Plaintiff,

v.

**TEXAS LAUREL RIDGE HOSPITAL L.P.
UHS OF DELAWARE, INC. DBA
UNIVERSAL HEALTH SERVICES OF
DELAWARE, INC., AND RODNEY
NORMAN,**
Defendant.

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Civil Action No. 5:19-cv-1469

PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

Pursuant to the Court's Scheduling Order and Rule 26(a)(2) of the Federal Rules of Civil Procedure, Plaintiff files her Designation of Expert Witnesses. Specifically, although discovery is still ongoing, and Plaintiff reserves the right to amend or supplement this designation, Plaintiff hereby designates the following testifying experts:

Melissa Morales Fletcher
Lawrence Morales II
The Morales Firm, P.C.
6243 IH-10 West, Suite 132
San Antonio, Texas 78201
210-225-0811

Said attorneys will provide opinions on the reasonable and necessary attorneys' fees incurred by Plaintiff to prosecute her claims against Defendants. If applicable, said attorneys will also testify in rebuttal to any attorneys' fee evidence offered by Defendants. Said attorneys' opinions are based on each of his/her experience and familiarity with fees customarily charged in this geographical area, in cases of this type; his/her personal knowledge, gained by participation in the litigation of this matter, of the legal services performed by his/her firm, and the legal services performed by counsel; his/her review of the billing records and time records of his/her firm in

this matter, and his/her firm's files in this matter, including pleadings, briefs, written discovery, depositions, correspondence, and research. Said attorneys' opinions are further based on his/her evaluations of the following factors: (1) the time and labor required to handle the case, (2) the relative difficulty and novelty of the legal and factual questions involved in this case, (3) the skill requisite to handle this case properly, (4) the preclusion of other employment by him/her and his/her firm inherent in taking this case, (5) the fees customarily charged by attorneys and law firms for work of the nature involved in this case, (6) the fee arrangements with Plaintiff, (7) the amounts in controversy in this case and the results sought by the client, (8) time limits imposed by the circumstances in this case, (9) the nature and length of the relationship between the attorneys and Plaintiff, and (10) the experience, abilities, and reputation of the attorneys handling the work in this case. Said attorneys will rely both on personal experience and on records (which may be redacted as to certain privileged information) depicting the time spent by attorneys, the services performed for or on behalf of same, and the fees charged for such time and services. Said attorneys may also rely on non-privileged information, such as pleadings and discovery in this case, and the documents produced by all parties in this litigation.

Fletcher's biographical information may be obtained at <https://www.themoralesfirm.com/attorney/fletcher-melissa-morales/>. Morales's biographical information may be obtained at <https://www.themoralesfirm.com/attorney/morales-lawrence-ii/>.

Respectfully submitted,

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BY: /s/ Allison Sarah Hartry
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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I do hereby certify that on September 22, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system, which will send notification of such filing to the all counsel of record.

/s/ Allison S. Hartry
Allison S. Hartry